

Kathryn Thomas

From: David Rothstein <drothstein@rothsteinlawfirm.com>
Sent: Wednesday, January 27, 2016 2:59 PM
To: Kathryn Thomas
Cc: kathy.helms@ogletreedeakins.com
Subject: RE: Irani - tortious interference claims

I have formally withdrawn only one of the tortious interference claims: the one against Dr. Koon from the original complaint. I have also withdrawn the claim for wrongful discharge in violation of public policy. With regard to the new claim of tortious interference with contract against Dr. Koon and Dr. Walsh, I have not withdrawn or abandoned that claim. It was stated in the alternative to the direct breach of contract claim against USC. I did not spend the limited time and space in my summary judgment brief discussing that claim, because I think there is sufficient evidence to hold USC directly liable on the breach of contract cause of action.

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From: Kathryn Thomas [<mailto:kthomas@gsblaw.net>]
Sent: Wednesday, January 27, 2016 10:06 AM
To: 'David Rothstein (drothstein@rothsteinlawfirm.com)' <drothstein@rothsteinlawfirm.com>
Cc: 'Helms, Kathy Dudley (Kathy.Helms@ogletreedeakins.com)' <Kathy.Helms@ogletreedeakins.com>
Subject: RE: Irani - tortious interference claims

David –

This should not take you more than 30 seconds to respond. Time is of the essence with our responses and replies. Please confirm.

From: Kathryn Thomas
Sent: Tuesday, January 26, 2016 4:11 PM
To: David Rothstein (drothstein@rothsteinlawfirm.com)
Cc: Helms, Kathy Dudley (Kathy.Helms@ogletreedeakins.com)
Subject: Irani - tortious interference claims

David –

As I read your memorandum, you are abandoning both of your tortious interference claims. Please confirm.